

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et
al.,

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**Declaration of Terrence M.
Connors, Esq.**

Case No. 24-CV-40-EAW-MJR

MOTION ON BEHALF OF:

Intervenors Clear Creek Legal, LLC,
Credit Advocates Law Firm, LLC,
Greenstone Legal Group, Brandon
Ellis Law Firm LLC, Hailstone Legal
Group, Hallock and Associates, Harbor
Legal Group, Anchor Law Firm,
PLLC, Bedrock Legal Group, Boulder
Legal Group, Canyon Legal Group,
LLC, Great Lakes Law Firm,
Heartland Legal Group, Level One
Law, Meadowbrook Legal Group,
Monarch Legal Group, Newport Legal
Group, LLC, Northstar Legal Group,
Option 1 Legal, Pioneer Law Firm
P.C., Rockwell Legal Group, Spring
Legal Group, Royal Legal Group, Slate
Legal Group, Stonepoint Legal Group,
The Law Firm of Derek Williams,
LLC, Whitestone Legal Group,
Wyolaw, LLC, Chinn Legal Group,
LLC, Leigh Legal Group, PLLC,
Hallock & Associates LLC, Gustafson
Consumer Law Group, LLC, Michel

Law, LLC, The Law Office of Melissa Michel LLC, and Moore Legal Group, LLC. (collectively, the “Law Firms”), by and through their attorneys Connors LLP

DATE, TIME, AND PLACE
OF MOTION:

To be determined by this Court before the Hon. Michael J. Roemer, United States Magistrate Judge, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.

Oral argument is requested.

RELIEF REQUESTED:

An Order modifying the Preliminary Injunction (Dkt. 184) to allow the processing and timely payment of a claim submitted by the Law Firms against a captive insurance policy at Cell Gramercy 2 of Contego Insurance, Inc., and to allow the processing and payment of future claims up to the policy’s limit.

GROUND FOR
RELIEF REQUESTED:

This Court’s March 4, 2024 Preliminary Injunction Order (Dkt. 184); Utah Code 31A-37-104; and this Court’s inherent authority.

SUPPORTING PAPERS:

Declaration of Terrence M. Connors, Esq., dated March 22, 2024, with exhibits, and the accompanying Memorandum of Law.

The Law Firms intend to submit reply papers.

DATED: Buffalo, New York
March 22, 2024

/s/ Terrence M. Connors
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